

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: MARTIN E. MONTANO and : CHAPTER 13
DEBORAH A. MONTANO, :
Debtors : No. 15-13846-elf

MARTIN E. MONTANO and :
DEBORAH A. MONTANO, :
Plaintiff : ADV. PRO. NO. 15-00404-elf
vs. :
SB1 FEDERAL CREDIT UNION, :
Defendant :
:

STIPULATION

It is hereby stipulated and agreed by and between Robert J. Wilson, Esquire, attorney for Movant, and Robert N. Braverman, Esquire, attorney for Debtor having expressed authority to enter into this stipulation that:

1. Creditor, Sb1 Federal Credit Union (hereinafter referred to as "Sb1"), on or about July 27, 2015, filed a Proof of Claim in the amount of One Hundred Thirty Seven Thousand Two Hundred Forty One Dollars and Seventy One Cents (\$137,241.71), in conjunction with its second position Mortgage lien on premises 9205 Wooden Bridge Road, Philadelphia, PA.

2. Sb1, on or about July 27, 2015, also filed a Proof of Claim in the amount Thirty Six Thousand Six Hundred Thirty Seven Dollars and Seventy Seven Cents (\$36,637.77), in conjunction with

its third position Mortgage lien on premises 9205 Wooden Bridge Road, Philadelphia, PA.

3. Creditor's Proof of Claim as to its second (2nd) mortgage lien in the amount of \$137,241.71 is agreed by and between the parties to be accurate and correct as of the date of the filing of this bankruptcy.

4. Creditor herein agrees that its Proof of Claim as to its third (3rd) mortgage lien in the amount of \$36,637.77 shall be classified as unsecured during the course of and for purpose of this bankruptcy.

5. This agreement by and between the parties is for the purpose of this bankruptcy only.

6. Should this bankruptcy be dismissed or Creditor herein granted relief from same or the underlying bankruptcy be converted to a Chapter 7 proceeding, the debt pursuant to both Mortgages and Notes shall be due and enforceable pursuant to the terms and conditions therein.

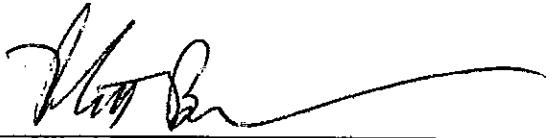
7. Upon written notice of an Order discharging Debtor after successful completion of their Plan in this bankruptcy, Creditor herein agrees that it shall take all actions necessary to have the security interest as to its third mortgage lien in the amount of

\$36,637.77 released with the Department of Records of Philadelphia County, Pennsylvania.

WILSON LAW FIRM

BY: 

ROBERT J. WILSON, ESQUIRE
Attorney for Creditor
Sb1 Federal Credit Union

BY: 

ROBERT N. BRAVERMAN, ESQUIRE
Attorney for Debtor